

STEVEN D. MEACHAM, ESQ.  
Nevada Bar No. 9863  
CARY B. DOMINA, ESQ.  
Nevada Bar No. 10567  
PEEL BRIMLEY, LLP  
3333 East Serene Avenue, Suite 200  
Henderson, Nevada 89074  
Phone: (702) 990-7272  
[smeacham@peelbrimley.com](mailto:smeacham@peelbrimley.com)  
[cdomina@peelbrimley.com](mailto:cdomina@peelbrimley.com)  
*Attorneys for Plaintiff*  
*Gallagher-Kaiser Corporation*

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF NEVADA**

GALLAGHER-KAISER CORPORATION, a  
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited  
liability company; BIO SHIELD TECH, LLC,  
a foreign limited liability company;  
HARTFORD CASUALTY INSURANCE  
COMPANY, an Indiana insurance  
corporation; NGM INSURANCE  
COMPANY, a Florida corporation; and DOES  
1-10 Insurance Company(ies), inclusive,

Defendants.

CASE NO. : 2:14-cv-00869

**STIPULATION AND REQUEST FOR  
ORDER EXTENDING BRIEFING  
SCHEDULE TO DEFENDANT NGM  
INSURANCE COMPANY'S MOTION  
TO DISMISS THIRD AMENDED  
COMPLAINT**

(First Request)

Plaintiff, GALLAGHER-KAISER CORPORATION ("GK"), by and through its attorneys  
of record, the law firm of PEEL BRIMLEY LLP, and Defendant, NGM INSURANCE COMPANY  
("NGM"), by and through its attorneys of record, the law firm of BARRETT & MATURA, P.C.,  
hereby stipulate and agree as follows:

**WHEREAS**, NGM filed its Motion to Dismiss Third Amended Complaint on April 10,  
2023 ("Motion");

**WHEREAS**, the original deadline for GK to file its Response Brief ("Response") to the  
Motion is April 24, 2023;

**WHEREAS**, due to scheduling conflicts, GK requested and received from NGM's counsel  
an additional week to file its Response to the Motion;

PEEL BRIMLEY LLP  
3333 E. SERENE AVENUE, STE. 200  
HENDERSON, NEVADA 89074  
(702) 990-7272 ♦ FAX (702) 990-7273

1           **THEREFORE**, the parties agree and stipulate that GK shall have up to and including  
2 Monday, May 1<sup>st</sup>, 2023 to file its Response to the Motion.

3           **IT IS SO STIPULATED.**

4           Dated this 24th day of April, 2023.

5           **PEEL BRIMLEY LLP**

6           **BARRETT | MATURA**

7           /s/ Cary Domina

8           /s/ Kevin Barrett

9           \_\_\_\_\_  
10 STEVEN D. MEACHAM, ESQ.

11           \_\_\_\_\_  
12 KEVIN BARRETT, ESQ.

13 Nevada Bar No. 9863

14 Nevada Bar No. 8959

15 CARY B. DOMINA, ESQ.

16 8925 East Pima Center Parkway, Suite 215

17 Nevada Bar No. 10567

18 Scottsdale, Arizona 85258

19 3333 E. Serene Ave, Suite 200

20 Direct: 602-792-5718

21 Henderson, NV 89074

22 Fax: 602-792-5710

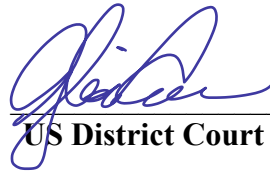
23 Telephone: (702) 990-7272

24 [kbarrett@barrettmatura.com](mailto:kbarrett@barrettmatura.com)

25 *Attorneys for Gallagher-Kaiser Corporation*

26 *Attorney for NGM Insurance Company*

27           **IT IS SO ORDERED.**

28           

4-24-23

US District Court Judge

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